

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC COMPANY,)	Docket No. 50-344
<u>ET AL.</u>)	(Control Building)
)	
(Trojan Nuclear Plant))	

NRC STAFF'S SECOND SET OF INTERROGATORIES
ON PHASE II TO CONSOLIDATED INTERVENORS

The Nuclear Regulatory Commission (NRC) Staff hereby requests that Consolidated Intervenor, pursuant to 10 CFR §2.740b, answer separately and fully, in writing under oath or affirmation, the following interrogatories within 14 days after service hereof.

For each response to the interrogatories listed below, identify the person or persons who prepared, or substantially contributed to the preparation of the response.

The NRC Staff further requests that the Intervenor, pursuant to 10 CFR §2.741, provide copies of, or make available for Staff inspection and copying, any documents referred to by the Intervenor in response to the accompanying interrogatories.

Interrogatories Related to Specific Contentions

The following interrogatories relate to contentions as modified and admitted by the Licensing Board in its Prehearing Conference Order of April 12, 1979 and to Consolidated Intervenor's contention 1 which, though not admitted

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as an issue in the Phase II proceeding, is to be considered by the Staff in the security evaluation the Staff is to conduct. Since the first set of interrogatories filed by the Staff on March 9, 1979 covered each contention submitted by Consolidated Intervenors, the numbering of the interrogatories in this second set will begin where the first set of interrogatories ended.

Contention 1

C1-19. In contention 1(b), you assert that the Licensee has not submitted sufficient information to determine whether security at Trojan during the modifications will be maintained with regard to physical security measures to accommodate additional workers for both the general plant and the modification areas. Do you believe that it is possible that additional physical security measures will be needed to accommodate the additional workers required to perform the modifications? If so, why?

C1-20. In contention 1 you state that your concerns with regard to security and the effects of the modifications thereon relate to four listed matters (contentions 1(a) to (d)) but are not limited to those matters. State specifically and in detail:

(a) any additional concerns you have with regard to security in relation to the modifications.

(b) the bases for those concerns.

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Contention 4

C4-4. In contention 4, you refer to the "extensive removal of structures" pursuant to the modifications. In the Staff's interrogatory C4-1 of March 9, 1979, you were asked to identify the structures referred to in the above phrase and you responded "All referred to in PGE-1020". Indicate specifically by section and page numbers those parts of PGE-1020 in which the structures referred to in Contention 4 are identified.

Contention 11

C11-4. In response to the Staff's interrogatory C11-2(a), you indicated that the "effects of drilling" to which you refer in contention 11 are, among other things, "exacerbating the existing deformities and cracks".

- (a) Are you personally aware of any "existing deformities and cracks" in the walls which will be drilled pursuant to the modification work.
- (b) If the answer to (a) is "yes", describe these existing deformities and cracks (i.e. size and nature), indicate where each is located (i.e. identify wall, elevation and approximate location at a particular elevation), and state the manner in which you became aware of the existence of these deformities and cracks.
- (c) If the answer to (a) is "no", state the basis for your assertion in response to Staff interrogatory C11-2(a) that deformities and cracks exist.

Respectfully submitted,

Joseph R. Gray
Joseph R. Gray
General for "DC Staff"

Dated at Chicago, Ill., 1979
this 15th day of May, 1979

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